

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of)
)
PUBLIC UTILITIES COMMISSION) Docket No. 2009-0108
)
Instituting a Proceeding to Investigate)
Proposed Amendments to the)
Framework for Integrated Resource)
Planning.)
)

HAWAII SOLAR ENERGY ASSOCIATION'S
FIRST INFORMATION REQUEST

AND

CERTIFICATE OF SERVICE

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PUBLIC UTILITIES
COMMISSION

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HAWAII SOLAR ENERGY ASSOCIATION'S
FIRST INFORMATION REQUEST

Pursuant to the Order Approving the Stipulated Procedural Order, As Modified, filed on September 23, 2009, Hawaii Solar Energy Association ("HSEA"), by and through its counsel, Earthjustice, submits the following information requests ("IRs") to Hawaiian Electric Co., Inc., Hawaii Electric Light Co., Inc., and Maui Electric Co., Ltd. (collectively, the "HECO Companies"), Division of Consumer Advocacy, Department of Commerce and Consumer Affairs of the State of Hawai'i ("CA"), and Kauai Island Utility Cooperative ("KIUC").

DEFINITIONS

"CESP proposal" means the proposed "Clean Energy Scenario Planning Framework" jointly submitted to the Public Utilities Commission ("Commission") on April 28, 2009 by the HECO Companies, CA, and KIUC.

"Documents" means and includes any and all written, graphic, or otherwise recorded matter however produced or reproduced or stored, relating in any manner to the subject matter indicated.

"IRP" means Integrated Resource Planning, and "IRP Framework" refers to the Framework for Integrated Resource Planning established in Docket No. 6617, Decision & Order ("D&O") No. 11523, filed on March 12, 1992, as amended by D&O No. 11630, filed on May 22, 1992.

“You” or “your” means the party or parties to whom these information requests are directed, their agents, representatives, employees, attorneys, and anyone else acting on their behalf.

INFORMATION REQUESTS

I. HSEA’s IRs to the HECO Companies, CA, and KIUC.

HSEA-IR-1(a): Are there any jurisdictions or energy utilities that have adopted “scenario planning” that you contend is similar to the CESP proposal? If yes, then please identify the jurisdictions or utilities and explain with specificity the similarities and differences between their scenario planning and the CESP proposal.

HSEA-IR-1(b): Please provide any and all documents relating to the response to IR-1(a) above.

HSEA-IR-2(a): Are there any jurisdictions or energy utilities that have adopted “Locational Value Maps” that you contend are similar to those in the CESP proposal? If yes, then please identify the jurisdictions or utilities and explain with specificity the similarities and differences between their Locational Value Maps and those in the CESP proposal.

HSEA-IR-2(b): Please provide any and all documents relating to the response to IR-2(a) above.

HSEA-IR-3(a): Are there any jurisdictions or energy utilities that have adopted “Clean Energy Investment Zones” that you contend are similar to those in the CESP proposal? If yes, then please identify the jurisdictions or utilities and explain with

specificity the similarities and differences between their Clean Energy Investment Zones and those in the CESP proposal.

HSEA-IR-3(b): Please provide any and all documents relating to the response to IR-3(a) above.

HSEA-IR-4(a): Are there any jurisdictions under which approvals in a “scenario planning” or IRP proceeding “elevate the status of the preferred resources identified in the [plan] . . . to give them a presumption of need in any subsequent siting proceeding,” as proposed in § II.D.2 of the CESP proposal? If yes, then please identify those jurisdictions.

HSEA-IR-4(b): Please provide any and all documents relating to the response to IR-4(a) above.

HSEA-IR-5: Please define with specificity which “subsequent siting proceeding(s)” you propose to be governed by the “presumption of need” under § II.D.2 of the CESP proposal.

HSEA-IR-6: Please describe and explain with specificity what is meant and intended by the term “high level” or “higher level” planning in the CESP proposal (see, e.g., §§ II.D.3 and IV.J.1) and how exactly it differs from the level of planning under previous IRP proceedings.

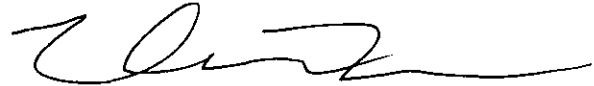
HSEA-IR-7: Please describe and explain with specificity any and all actual differences between the method of analysis employed under the last IRP proceeding (aka “IRP-4”) and the proposed method of analysis under the CESP proposal.

II. HSEA's IRs to KIUC.

HSEA-IR-8(a): Please identify, describe and explain with specificity the "certain utility planning requirements imposed upon KIUC by its lender, the Rural Utilities Service" referenced in the April 28, 2009 letter from the HECO Companies, KIUC, and CA to the PUC, which you contend are potentially relevant in this proceeding.

HSEA-IR-8(b): Please provide any and all documents relating to the response to IR-8(a) above.

DATED: Honolulu, Hawai'i, November 10, 2009



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| Planning |) | |
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this date, a copy of the foregoing documents were duly served by first-class postage prepaid mail and electronic mail to the following parties addressed as follows:

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DATED: Honolulu, Hawai'i, November 10, 2009



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